July 30, 2001

Mr. Raymond J. Tessier Group Director – Environmental Services General Motors Corporation 485 West Milwaukee Avenue, MC 482-302-205 Detroit, MI 48202-3220

Re: Review Request 095-14421-00005

Delphi Interior and Lighting Systems Plant No. 9

**Emission Reductions** 

Dear Mr. Tessier:

Commissioner Kaplan has asked me to respond to your May 15, 2001 letter. In this letter you informed the Indiana Department of Environmental Management (IDEM) that Plant No. 9 had ceased operations in June 1996 and that GM intends to use the resulting reduction in emissions to satisfy new source review requirements for ozone nonattainment areas.

As you noted, Madison County has not been designated as nonattainment for ozone. If there is a redesignation, it is not known whether Indiana will need to revise the new source review requirements contained in the State Implementation Plan (SIP) to include emission offset provisions. At the present time Madison County is subject to the rules for attainment areas. Those rules generally do not allow the use of emission reductions that have occurred more than five years prior to construction of a new source.

I have forwarded your letter and this response to our staff responsible for developing revisions to our SIP so that they are aware of your interest. I have also forwarded your letter to IDEM's main file room for the Madison County file of potential emission credits. That will make it available to parties interested in obtaining credits. The IDEM would evaluate the future use of these reductions under the rules that apply to a given proposal.

If you have any questions regarding this matter, please contact Rebecca Mason at 317-233-9664 or 1-800-451-6027 (ext 3-9664).

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

cc: File - Madison County
Air Compliance Section Inspector – Warren Greiling
Compliance Data Section - Karen Nowak
Permit Tracking - Janet Mobley
Air Programs Section - Michele Boner